

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) GORDON ERNST,  
(2) DONNA HEINEL,  
(3) LAURA JANKE,  
(4) ALI KHOSROSHAHIN,  
(5) STEVEN MASERA,  
(6) MIKAELA SANFORD,  
(7) MARTIN FOX,  
(8) IGOR DVORSKIY,  
(9) LISA "NIKI" WILLIAMS,  
(10) WILLIAM FERGUSON,  
(11) JORGE SALCEDO, and  
(12) JOVAN VAVIC,

Defendants

Criminal No. 19cr10081

SEALED


GOVERNMENT'S MOTION TO SEAL  
INDICTMENT

Pursuant to Fed. R. Crim. P. 6(e)(4), the United States of America hereby moves this Court to direct that the Indictment, this Motion to Seal, the Court's order on this motion, the docket sheet, and any other paperwork related to this matter, be sealed until the defendant makes an appearance, waives his or her indictment, and pleads guilty. As grounds for this motion, the Government states that Defendant is cooperating proactively in an active investigation. Accordingly, public disclosure of these materials will jeopardize the ongoing investigation of this case.

The United States further moves, pursuant to General Order 06-05, that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents that the United States has filed in this matter.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By:   
ERIC S. ROSEN  
Assistant U.S. Attorney

Date: March 5, 2019

